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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

IN RE WATTSTOCK, LLC,

Debtor.

WATTSTOCK LLC,

Plaintiff,

v.

ALTA POWER LLC,

Defendant, Counter-Plaintiff, and Third-Party Plaintiff,

v.

WATTSTOCK LLC,

Counter-Defendant, and

**GENERAL ELECTRIC
INTERNATIONAL, INC., d/b/a GE
POWER SERVICES,**

Third-Party Defendant.

Case No. 21-31488-sgj11V

**Chapter 11
Subchapter V**

Adv. No. 21-03083-sgj

*Removed from the District Court of
Dallas County, Texas, 116th Judicial
District*

Case No. DC-20-08331

**GENERAL ELECTRIC INTERNATIONAL, INC.'S RULE 12(C)
MOTION TO COMPEL PRODUCTION OF DOCUMENTS FROM ALTA POWER LLC**

Third-Party Defendant General Electric International, Inc. (“GE”) hereby respectfully moves the Court to compel the production of documents from Defendant and Third-Party Plaintiff Alta Power, LLC (“Alta”) under Federal Rule of Civil Procedure 37(a) and order Alta to (1) collect and produce relevant documents currently in the possession of Alta’s outside counsel as requested in Requests for Production (“RFP”) 23, 57, 73, and 74 and (2) search for and produce relevant documents currently within Alta’s possession that involve Alta’s outside counsel for these same RFPs. The grounds for this motion are fully set forth in the accompanying opening brief, filed concurrently.

Dated: October 5, 2022

Respectfully submitted,

/s/ Andrew LeGrand
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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document has been served on counsel of record pursuant to the Federal Rules of Civil Procedure.

/s/ Andrew LeGrand
Andrew LeGrand

*Attorney for General Electric
International, Inc.*